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BURLINGTON ENVIRONMENTAL

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RCRA PERMITS SECTION

June 23, 1993

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Mr. Douglas Brown
Washington Department of Ecology, Hazardous Waste Permits Section
P.O. Box 47600
Olympia, WA 98504-7600

Re: Pier 91 Facility Part B Permit Appeal, Proposed Revised Permit Language and Supplemental Information

Dear Mr. Brown:

As discussed during our meeting on June 9, 1993, Burlington is providing suggested revisions to Condition II.A.12. (PCB Testing) of the Pier 91 Facility Part B Permit. This condition now refers to the Attachment CC (Waste Analysis Plan) for additional information regarding PCB analysis and disposition of PCB-contaminated materials. The proposed WAP revisions have been enclosed for your review.

Regarding Permit Condition II.A.6., a copy of the Burlington's standard laboratory Quality Assurance Program Plan (QAPP) has been enclosed for your review. This QAPP is referenced in the permit condition, and Burlington will incorporate the QAPP in Appendix C-3 of Attachment CC. The introductory section of the QAPP will clearly state that any laboratory used for profile analyses must meet the standards of the QAPP, and that the Pier 91 laboratory is not used for waste profiling.

Thank you for your efforts in resolving these issues. If you have any questions, please call me at (206) 654-8087.

Sincerely,

Keith A. Lund

Keith Lund
Senior Environmental Compliance Specialist

Attachments

cc: Stephanie Delaney, AAG/Ecology
Doug Hotchkiss, Port of Seattle
Galen Tritt, Ecology NWRO
Carrie Sikorski, EPA

w/o QAPP

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ATTACHMENT
JUNE 23, 1993

PROPOSED REVISED PERMIT LANGUAGE
BURLINGTON ENVIRONMENTAL INC.
PIER 91 FACILITY PART B PERMIT

Note: underlining indicates new language, strikethrough indicates deleted language.

II.A.12. PCB ANALYSIS OF OUTGOING WASTE

Delete previous II.A.12 language regarding PCB analysis specific to incoming wastes, as it simply restates wording found in the Waste Analysis Plan.

Suggested revised language:

II.A.12. The non-aqueous phase of each outgoing shipment of dangerous waste generated at the facility and shipped off-site for further treatment or disposal shall be sampled and analyzed for the presence of regulated concentrations of PCBs, using the PCB Analysis defined in Attachment CC. Procedures to prevent acceptance of incoming materials containing regulated levels of PCBs, and actions taken in the event PCBs are found to be present in outgoing material shipments will be as described in Attachment CC.

Supplemental information:

The proposed revisions to the Waste Analysis Plan are attached. This language will be incorporated as a new section (Section C2.9, PCB Analysis and Tracking Procedures). A flowchart summarizing this information will be presented as Figure C2-2, PCB Analysis and Tracking Procedures.

Proposed Revision to Attachment CC

Section C2.9 PCB Analysis and Tracking Procedures

Dangerous wastes potentially treatable at the Pier 91 facility will have the non-aqueous portion of the waste stream analyzed for PCBs. If analytical results indicate the material contains greater than 2 ppm PCBs, the material will be directed to an alternate facility.

If the PCB source is determined (through generator knowledge or analytical results) to be greater than 50 ppm, the material will be directed to a facility permitted to wastes regulated by the Toxic Substances Control Act (TSCA). If both the source and concentration of PCBs in the material are less than 50 ppm, the material will go to another RCRA permitted facility.

Upon completion of the profiling process and determination that the material is acceptable and treatable at the Pier 91 facility, the generator will be notified and be allowed to schedule the shipment into the facility.

For each shipment of non-aqueous waste sent into the Pier 91 facility, the generator is required to provide a certification stating that the material does not contain PCBs regulated under TSCA. This certification is required to accompany the material into the facility.

When the shipment arrives at the facility, a representative sample will be taken and fingerprint analyses, which include a Chlor-D-Tect test on any oil phases, are performed to assure that the material received significantly matches the material described on the profile. A second representative sample is also taken and retained for analysis in the event of future question or discrepancies.

If the material received does not match the profile, the generator is given the option of re-profiling the material or having the material rejected back to them. If the generator chooses to have the material re-profiled, acceptability of the material at the Pier 91 facility will be determined during the profiling process.

If fingerprint analyses show that the material matches the profile, the material will be accepted and a waste receipt tracking number is assigned to the shipment and all pertinent information is recorded in the waste input log. Additionally, all in-plant transfers are recorded on transfer sheets. By utilizing the waste input log and the in-plant transfer sheets, the contents of any tank can be track to the original shipment(s).

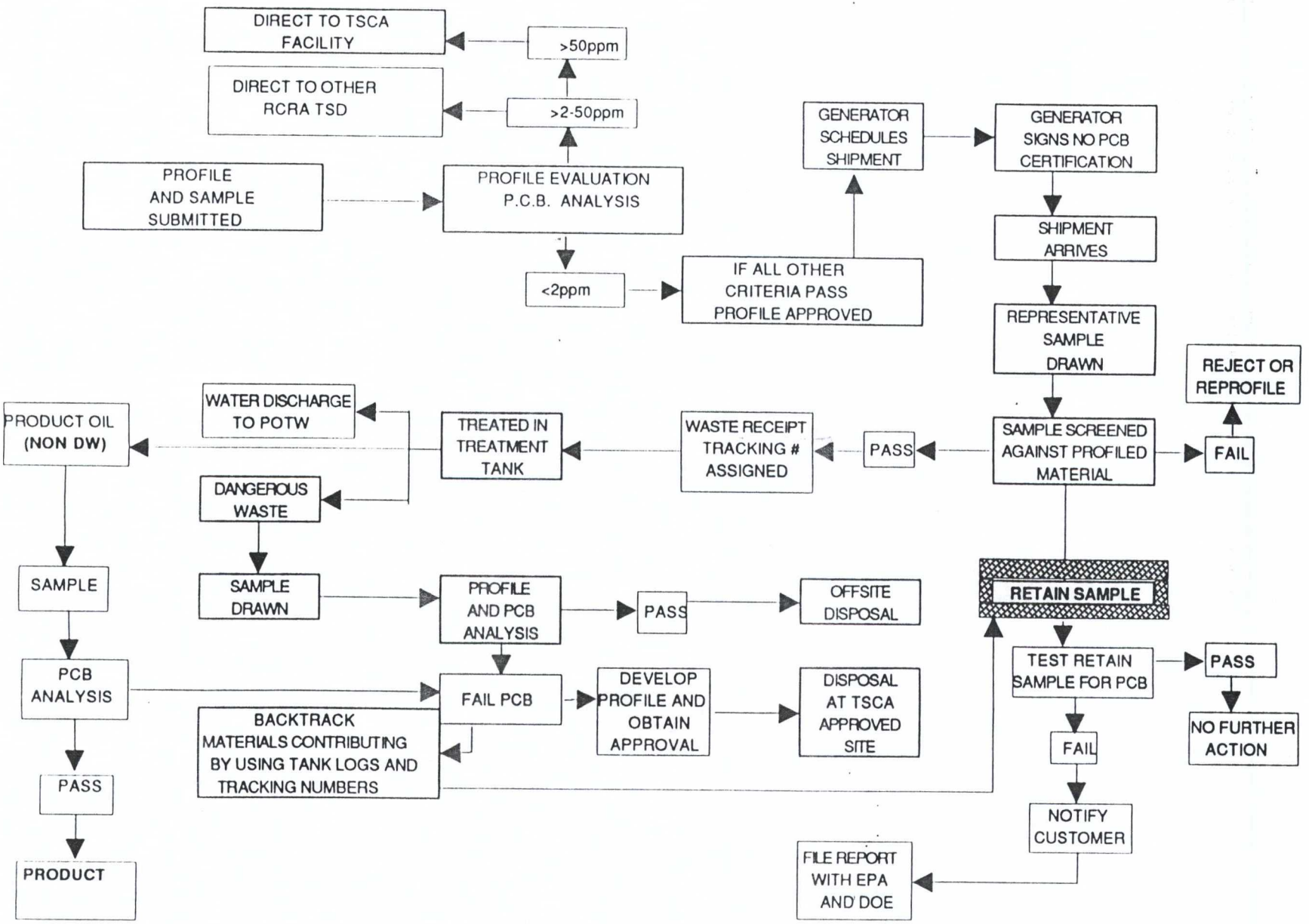
Once the material has been treated, there are potentially three different phases generated: (1) effluent water which is discharged to the POTW under conditions of a permit issued by the Municipality of Metropolitan Seattle, (2) product oil which is tested for parameters to be used as blend stock for marine fuel, and (3) dangerous waste.

The non-aqueous phases of each outgoing shipment of dangerous waste generated at the facility and shipped off-site for further treatment or disposal shall be sampled and analyzed for the presence of regulated concentrations of PCBs using the PCB analysis described in Appendix C-2. PCB analysis shall also be performed on product oil prior to shipment off-site.

If the material fails the PCB analysis, a profile for the material will be submitted to TSCA permitted facility. Upon profile approval, the material will be shipped off-site to the TSCA permitted facility.

In addition, the tank transfer sheets and input logs will be examined and backtracking will be performed to identify all shipments which contributed to the material failing PCB analysis. Once all contributing shipments have been identified, the retain samples of those shipments will be analyzed for PCBs.

If analytical results show that any of the shipments contained PCBs in regulated quantities, facility Operations personnel will notify the appropriate Regulatory Affairs and Sales personnel. The sales representative, in conjunction with Regulatory Affairs, will notify the generator. Operations, in conjunction with Regulatory Affairs, will notify Ecology and EPA through use of an unmanifested waste report.



Burlington Environmental Inc.
Pier 91 Facility

PCB Analysis and Tracking Procedures

Figure C2-2